

EXHIBIT "D"

1 KENNER LAW FIRM, P.C.
David E. Kenner, SBN 41425
2 Brett A. Greenfield, SBN 217343
16000 Ventura Boulevard, PH 1208
3 Encino, CA 91364
818 995 1195
4 818 475 5369 - fax

5 WADE, KELLY & SULLIVAN
733 W. 4th Avenue, Suite 200
6 Anchorage, Alaska 99501
(907) 561-7743
7 (907) 562-8977 - fax
Attorney for Defendant Josef F. Boehm

8
9 IN THE UNITED STATES DISTRICT COURT
10 DISTRICT OF ALASKA

11 Sally C. Purser,)
12 Plaintiff,) DEFENDANT JOSEF BOEHM'S SECOND
13 v.) SET OF DISCOVERY REQUESTS TO
14 Josef F. Boehm, Allen K.) PLAINTIFF
15 Bolling, and Bambi Tyree,)
16 Defendants.)

17)
18) CASE NO.: A05-0085 (JKS)
19)

20 DEFENDANT'S SECOND SET OF DISCOVERY REQUESTS

21 Pursuant to Federal Rules of Civil Procedure 26 and 36, the
22 Plaintiff requests that Defendant Boehm answer the attached
23 interrogatories in writing and under oath within thirty (30) days
24 from the date of service. Pursuant to Federal Rules of Civil
25 Procedure 26(c) you are requested to supplement your answers if you
26 become aware that the answers given are incorrect, misleading or
incomplete.

1 DEFINITIONS

2 Unless the question conclusively indicates otherwise, the
3 following definitions apply to the words used in these
4 interrogatories:

5 A. Person: The term "person" includes a corporation,
6 partnership, other business association or entity, a natural
7 person, and any government or government body, commission, board,
8 or agency;

9 B. Document: The term "document" is defined to mean and
10 include any and all graphic or physical representations, including
11 without limitation all handwritten, typed or printed material,
12 photographs, copies of all the foregoing, and material stored on
13 tape or any other magnetic medium;

14 C. Identification of Documents: When you are requested to
15 "identify" a document, you are requested to provide the following
16 with regard to each document:

17 (1) A description of the document with sufficient
18 particularity to enable the custodian of the document to respond to
19 a request for production or subpoena duces tecum for the document;

20 (2) The name, business address, residence address,
21 telephone number, and occupation of each person who prepared or
22 signed the document.

23 D. Identification of Natural Person: When you are requested
24 to "identify" a natural person, you are requested to provide the
25 following with regard to each such person:

26 (1) The name of the person;
27
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- 1 (2) The business address of the person
- 2 (3) The residence of the person;
- 3 (4) The business telephone number of the person;
- 4 (5) The residence telephone number of the person;
- 5 (6) The occupation of the person and the name of the
- 6 employer of the person, if any.

7 E. "You" or "Your" means Sally Purser

8 INTERROGATORIES

9 1. As to each person identified in your Final Witness List,

10 describe in detail, including, but not limited to the following:

- 11 a. How you first met;
- 12 b. When you first met;
- 13 c. Who introduced you;
- 14 d. Where you first met;
- 15 e. The nature of your relationship, how long it lasted,
- 16 and why it ended;
- 17 f. That person's knowledge of your alleged sexual contact
- 18 with Defendant Boehm;
- 19 g. That person's knowledge of your alleged drug use with
- 20 Defendant Boehm;
- 21 h. That person's facilitating or involvement with the
- 22 activities described in subsection (f);
- 23 i. That Person's facilitating or involvement with the
- 24 activities described in subsection (g).

19 2. Identify each and every academic institution you attended,

20 including but not limited to the following:

- 21 a. Name;
- 22 b. Address;
- 23 c. Phone number;
- 24 d. Dates attended;
- 25 e. Reason for leaving the institution;
- 26 f. Highest grade level completed;
- 27 g. Course of studies at each academic institution;
- 28 h. Suspensions from each academic institutions;
- i. Expulsions from each academic institution;
- j. Activities leading to a suspension at each institution;
- k. Activities leading to an expulsion at each institution.

1 3. Identify all of your criminal convictions in detail as
2 follows:

- 3 a. date of arrest;
4 b. arresting agency;
5 c. initial charges filed against you;
6 d. charges you were convicted of;
7 e. sentencing requirements for each conviction;
8 f. probation requirements for each conviction.

9 4. Identify each and every drug rehabilitation facility you
10 have attended, including, but not limited to:

- 11 a. Name;
12 b. address;
13 c. phone number;
14 d. dates attended;
15 e. Reason for leaving;
16 f. certificates earned;
17 g. evaluations completed.

18 5. Identify each and every prescription drug prescribed to
19 you, including but not limited to:

- 20 a. Name of drug;
21 b. Date of prescription;
22 c. Treating physician;
23 d. Address of treating physician who prescribed
24 medication;
25 e. Phone number of treating physician who prescribed
26 medication;
27 f. Physical or mental ailment requiring each
28 prescription.

29 6. Is your response to each Request for Admission served with
30 these interrogatories an unqualified admission? If not, for each
31 response that is not an unqualified admission:

- 32 a. State the number of the request;
33 b. State all facts upon which you base your response;
34 c. State the names, addresses, and telephone numbers of
35 all persons who have knowledge of those facts;
36 d. Identify all documents and other tangible things that
37 support your response and state the name, address and
38 telephone number of the person who has each document
or thing.

REQUESTS FOR ADMISSION

1. Admit you smoked marijuana before initially meeting Defendant Boehm;
2. Admit you smoked marijuana with your mother Kathleen Purser before initially meeting Defendant Boehm;
3. Admit you snorted cocaine before initially meeting Defendant Boehm;
4. Admit you snorted cocaine with your mother Kathleen Purser before initially meeting Defendant Boehm;
5. Admit that you viewed your father being violent towards your mother on several occasions;
6. Admit you engaged in sexual intercourse and/or oral sex with individuals other than Defendants Boehm, Bolling or Williams before the age of eighteen years old;;
7. Admit that you smoked "crack" cocaine before initially meeting Defendant Boehm;
8. Admit that you smoked "crack" cocaine with your mother Kathleen Purser before initially meeting defendant Boehm;
9. Admit that you drank alcohol before initially meeting Defendant Boehm;

- 1 10. Admit that you drank alcohol with your mother Kathleen Purser
- 2 before initially meeting Defendant Boehm;
- 3
- 4 11. Admit that your mother Kathleen Purser physically assaulted you
- 5 on more than one occasion;
- 6
- 7 12. Admit that drug addiction is prevalent in your family;
- 8
- 9 13. Admit that You were sexually abused by your uncle;
- 10
- 11 15. Admit you were expelled from an academic institution for drug
- 12 sales;
- 13
- 14 16. Admit you worked as a prostitute on Chuchach Drive, also known
- 15 as "the track";
- 16
- 17 17. Admit you engaged in sexual intercourse and/or oral sex with
- 18 individuals other than Defendant Boehm, Bolling or Williams
- 19 before the age of sixteen years old;
- 20
- 21 18. Admit that you assisted in the day to day operations of an
- 22 escort service for Jay Whaley;
- 23
- 24 19. Admit that you sold drugs for Jay Whaley;
- 25
- 26 20. Admit that you had sexual relations with Jay Whaley before the
- 27 age of eighteen;
- 28

1 21. Admit that you were involved in a conspiracy to keep Defendant
2 Boehm high on drugs in order to steal money from him;

3
4 22. Admit that you have stated that Defendant Boehm was a victim of
5 Bambi Tyree, Leslie Williams and Allen Bolling;

6
7 23. Admit that your mother Kathleen Purser sold you for "crack
8 cocaine";

9
10 24. Admit that you traded sexual favors with individuals in
11 exchange for money and drugs other than the alleged occurrences
12 defendants Bolling, Williams and Boehm;

13
14 25. Admit that you traded sexual favors for money and drugs with
15 Carl Bucher before initially meeting Defendant Boehm;

16
17 26. Admit that defendants Tyree, Williams and Bolling laced
18 defendant Boehm's drugs and food with a foreign substance in
19 order keep him "High" and steal his money;

20
21 27. Admit that you worked as a prostitute at the direction of Jay
22 Whaley.


23
24 28. Admit that Defendant Boehm is not the cause of your drug abuse
25 history;

1 29. Admit that Defendant Boehm is not the cause of your history of
2 engaging in prostitution;

3
4 30. Admit that Defendant Boehm is not the cause of your history of
5 engaging in drug sales.

6
7 Dated: November 10, 2006

KENNER LAW FIRM, P.C.

8
9 By: 
10 David E. Kenner
11 Attorney for Defendant
12 Josef F. Boehm
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1 INTERROGATORY VERIFICATION

2 STATE OF ALASKA

3 THIRD JUDICIAL DISTRICT

4 Sally Purser, being first duly sworn, upon oath, deposes and
states:

5 I am the plaintiff in the above-entitled action; that I have
6 read the responses to the Interrogatories and believe them to be
true and correct to my knowledge and belief.

7
8 Sally Purser

9
10 SUBSCRIBED AND SWORN TO before me this _____ day of December,
11 2006.

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16 NOTARY PUBLIC in and for Alaska.

17 My Commission Expires: _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of November, 2006. I caused a true and correct copy of the foregoing **DEFENDANT'S SECOND SET OF DISCOVERY TO PLAINTIFF PURSER** The following parties were served via U.S. Mail on November 10, 2006:

Pamela Sullivan, Esq.
733 West 4th Street
Suite 200
Anchorage, AK 99501

Allen K. Bolling
Inmate No: 14911-006
USP Terre Haute
U.S. Penitentiary
P.O. Box 12015
Terre Haute, IN 47801

Josef Boehm
Reg. # 14887-006
P.O. Box 5300
Adelanto, CA 92301

Bambi Tyree
c/o Mary Pate, Esq.
425 G. Street, Suite 930
Anchorage, Alaska 99501

Leslie Williams
Inmate No: 14903-006
FCI Yazoo City Medium
P.O. Box 5888
Yazoo City, MS 39194

Dated: November 10, 2006


Rosie Ruiz

DEFENDANT'S SECOND SET OF DISCOVERY TO PLAINTIFF PURSER